

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2020-229-E

IN THE MATTER OF:

Dominion Energy South Carolina,
Incorporated's Establishment of a Solar Choice
Metering Tariff Pursuant to S.C. Code Ann.
Section 58-40-20

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**PETITION TO INTERVENE
OF VOTE SOLAR**

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Vote Solar hereby respectfully petitions to intervene in the above-captioned generic docket. Vote Solar states the following grounds in support of this petition:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar¹ works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 110,000 members nationally and more than 2,300 in South Carolina, including members within Dominion Energy South Carolina's ("DESC") service territory.

2. In state regulatory proceedings, Vote Solar primarily focuses on rate design and public policy issues related to consumer use of and access to distributed solar

¹ Vote Solar is not an industry group and does not have solar industry members.

generation. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other forms of distributed solar, Vote Solar has actively participated in utility commission proceedings across the country involving net metering, interconnection, rate design, and resource procurement, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, South Carolina, Utah, Vermont, and Wisconsin. In each of these cases, Vote Solar effectively advocated against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize distributed solar generation to effectively manage electricity costs.

3. The name and principal business address of Petitioner:

Vote Solar
360 22nd St., #730
Oakland, CA 94612

4. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina and requests that undersigned counsel be added to the official service list:

Thadeus B. Culley
SC Bar # 104428
Vote Solar
Sr. Regional Director and Regulatory Counsel, Southeast
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

5. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket should be directed to Vote Solar's counsel of record.

6. Vote Solar has a substantial interest in the subject matter of this proceeding. Vote Solar participated in a stakeholder process led by the Office of Regulatory Staff over the summer of 2019 to explore solutions to the then pending net metering cap. Vote Solar worked with stakeholders throughout the development of the Energy Freedom Act (Act 62) on net metering issues and has a direct interest in fulfilling the implementation of the provisions of the Energy Freedom Act.

7. Vote Solar has extensive national experience on matters of distributed generation valuation and methodology, rate design, cost-benefit evaluations of distributed energy resources, and net metering policy. Vote Solar expects to meaningfully contribute to the development of the record in this proceeding and to provide evidence consistent with the requirements of the Energy Freedom Act.

8. No other party will adequately represent Vote Solar's unique interest.

WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted this 28th day of October, 2020.

/s/ Thadeus B. Culley
Thadeus B. Culley
SC Bar # 104428
Counsel for Vote Solar
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-229-E, listed below, a copy of the Petition to Intervene of Vote Solar via U.S. Mail or electronic mail on this day, October 28, 2020.

/s/ Thadeus B. Culley
 Thadeus B. Culley
 1911 Ephesus Church Road
 Chapel Hill, NC 27517
thad@votesolar.org

PARTIES SERVED

Jenny R. Pittman , Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 Email: jpittman@ors.sc.gov Phone: 803-737-0889/0794 Fax: 803-737-0895	K. Chad Burgess , Director & Deputy General Counsel Dominion Energy Southeast Services, Incorporated 220 Operation Way - MC C222 Cayce, SC 29033 Email: chad.burgess@dominionenergy.com Phone: 803-217-8141
Carri Grube Lybarker , Counsel SC Department of Consumer Affairs ***For Notice Purposes** Email: clybarker@scconsumer.gov Phone: 803-734-4297 Fax: 803-734-4287	R. Taylor Speer* Turner, Padget, Graham & Laney, P.A. ***PTI Pending** Email: tspeer@turnerpadget.com
Jeffrey M. Nelson , Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 Email: jnelson@ors.sc.gov Phone: 803-737-0800 Fax: 803-737-0895	Matthew W. Gissendanner , Senior Counsel Dominion Energy South Carolina, Incorporated 220 Operation Way - MC C222 Cayce, SC 29033-3701 Email: matthew.gissendanner@dominionenergy.com Phone: 803-217-5359 Fax: 803-217-7931
Roger P. Hall* , Assistant Consumer Advocate South Carolina Department of Consumer Affairs ***For Notice Purposes** Post Office Box 5757 Columbia, SC 29250 Email: rhall@scconsumer.gov Phone: 803-734-4240	